

EXHIBIT 1

Ca

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

BRUCE CRAIGIE and
BARBARA CRAIGIE,

Case No. 1:15-cv-00441

Plaintiffs,

Hon. Janet T. Neff

v.

NATIONSTAR MORTGAGE, LLC,
a limited liability company, and
JOHN DOES 1-5,

Defendants.

Theodore J. Westbrook (P70834)
Amanda P. Narvaes (P74957)
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Nationstar Mortgage, LLC
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Grand Rapids, MI 49503
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PLAINTIFFS' SECOND SET OF DISCOVERY REQUESTS TO DEFENDANT
NATIONSTAR MORTGAGE, LLC

Plaintiffs Bruce and Barbara Craigie, by and through their attorneys, Drew, Cooper & Anding, P.C., request that Defendant Nationstar Mortgage, LLC ("Nationstar") provide responses to the following Requests for Admission, Interrogatories and Requests for Production of Documents within 30 days pursuant to Federal Rules of Civil Procedure 26, 33, 34 and 36.

DEFINITIONS AND INSTRUCTIONS

Unless otherwise stated, the following are applicable to all Requests for Production of Documents, Interrogatories and Requests for Admission:

A. “You” and “Your” shall mean Nationstar and the agents, employees and attorneys, past and present, of Nationstar.

B. The term “Document” as used herein is intended to have the broadest possible definition under Federal Rule of Civil Procedure 34 and should be read to include, but not be limited to: all writings or visible images of any kind, whether in final or draft form, now or at any time in Your possession, custody or control, and including all copies of each document if the copies contain any additional writing or are not identical copies of the original. The term “Document” includes, but is not limited to, letters, invoices, contracts, agreements, receipts, correspondence, electronic mail, memoranda, notes, photographs, diary and calendar entries, records of meetings, minutes or statistical compilations, statements, tape or other audio recordings, summaries or records of telephone calls, summaries or records of meetings or conferences, summaries or records of personal conversations or interviews, records of other conversations or communications, reports, computer programs, electronic data compilations and electronic files.

C. The term “Identify,” when used in reference to documents, means to state the following with respect to each document: (1) its date; (2) the identity of the person(s) who authored it; (3) the identity of the person(s) to whom it was addressed and who are known or believed to have received copies of it; (4) the form of the document (that is, letter, memorandum, invoice, etc.); (5) its title; (6) its length (in number of pages); (7) the identity of the person(s)

whom You know of believe to have a copy or draft of the document; and (8) a description of the subject matter of the document.

D. The term "Lake Drive" shall refer to 1625 Lake Drive, East Grand Rapids, Michigan.

E. The term "Scenic Drive" shall refer to 2985 Scenic Drive, Fruitland Township, Michigan.

F. The term "Modification Requests" shall mean any request or attempt by the Plaintiffs or their agents to secure a modification of either of the Mortgage Loans.

G. The term "Mortgage Loan(s)" shall refer to the Mortgages, Notes and related closing Documents executed in April, 2006 for refinancing of the Lake Drive and the Scenic Drive properties.

H. The term "Foreclosures" shall refer to the process, including procedures leading up to, and following the completion of the sheriff's sales of the Lake Drive and the Scenic Drive properties.

I. If You decline to answer any Request for Production of Documents on the grounds of burdensomeness, identify the number and nature of documents needed to be searched, the location of the documents, and the number of person hours and costs required to conduct a search of the documents.

J. If You claim a privilege not to answer any Request for Production of Documents, Request for Admission, or Interrogatory, You should identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for such claim.

REQUESTS FOR ADMISSION

1. Admit that Nationstar is a “debt collector” as that term is used in the Fair Debt Collection Practices Act.

ADMIT OR DENY:

2. Admit that Nationstar attempted to collect debts from Bruce Craigie which he owed to one or more persons or corporations other than Nationstar.

ADMIT OR DENY:

3. Admit that Nationstar’s attempts to collect debts from Bruce Craigie included engaging counsel in Michigan and instructing such counsel to foreclose on Lake Drive and Scenic Drive.

ADMIT OR DENY:

4. Admit that Nationstar’s principal business is mortgage loan servicing.

ADMIT OR DENY:

5. Admit that Nationstar’s business includes obtaining servicing rights to mortgage loans subsequent to those mortgage loans becoming delinquent.

ADMIT OR DENY:

6. Admit that Nationstar’s business entails soliciting servicing rights from holders of mortgage loan indebtedness.

ADMIT OR DENY:

7. Admit that on February 26, 2014, Nationstar closed its loan modification “case” with respect to Lake Drive without either granting or denying the Modification Request.

ADMIT OR DENY:

8. Admit that with respect to Bruce Craigie’s HAMP Modification Request submitted to Nationstar on March 8, 2014, Nationstar did not grant or reject the Modification Request on or before April 2, 2014.

ADMIT OR DENY:

9. Admit that with respect to Bruce Craigie’s HAMP Modification Request submitted to Nationstar on March 8, 2014, Nationstar did not send any written request asking Bruce Craigie to supply required information.

ADMIT OR DENY:

INTERROGATORIES

1. To the extent Your answer to any of the foregoing Requests for Admission is anything other than an unqualified admission, explain in detail the basis for Your denial or failure to admit and Identify any Documents which support Your denial or failure to admit.

RESPONSE:

2. Identify by name, title, department and business address each person providing or assisting in providing answers to the foregoing Requests for Admission and these Interrogatories.

RESPONSE:

3. Identify by name, and provide the title, department, business address, current or last known home address, current or last known telephone number, and whether he or she is a current Nationstar employee, the following persons as identified in Nationstar's "COLLECTION HISTORY PROFILE" documents for Lake Drive and Scenic Drive:

- a. TJOHNSON
- b. NMILDENBER
- c. AB
- d. NUPERESA
- e. PPATEL4
- f. ITORRES
- g. RSTEPHAN
- h. PSMITH2
- i. IRUMP
- j. KS1034
- k. SMAHARANA
- l. KBROEREN
- m. PBURNS
- n. ARAV1036
- o. KFULTON

p. GELBOURINI

q. LELLISON

r. MTRAYLOR

RESPONSE:

4. Identify any and all Documents You believe were requested in Nationstar's February 21, 2014 letter to Bruce Craigie in connection with a HAMP application, but were not received by Nationstar on or before March 8, 2014.

RESPONSE:

5. Identify any and all Documents You believe were requested in Nationstar's October 31, 2013 letter to Bruce Craigie in connection with a "BoNY Trial Period" request, but were not received by Nationstar on or before February 26, 2014.

RESPONSE:

6. Identify any and all Documents which list the documents Nationstar required in order to consider a "BoNY Trial Period" request "complete."

RESPONSE:

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce any and all Documents identified in Your answers to the foregoing Requests for Admission and Interrogatories.

RESPONSE:

2. Produce each "pre-sale checklist" relating to Scenic Drive or Lake Drive.

RESPONSE:

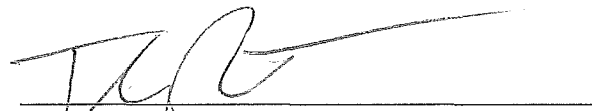
3. Produce each "hold report" relating to Scenic Drive or Lake Drive.

RESPONSE:

4. Produce each "affidavit" and "affirmation" referenced in each "COLLECTION HISTORY PROFILE" for Lake Drive and Scenic Drive.

RESPONSE:

Respectfully submitted,



Theodore J. Westbrook (P70834)

Amanda P. Narvaes (P74957)

DREW, COOPER & ANDING, P.C.

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Dated: December 21, 2015

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